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13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 Hernando Alberto Heredia,

16 Plaintiff,

17 v.

18 United States of America *ex rel.* United
 19 States Postal Service,

20 Defendants.

Case No. 2:22-cv-01846-RFB-DJA

**Stipulation to Extend Joint Pretrial
 Order Deadline**

(Second Request)

21 Pursuant to Fed. R. Civ. P. 6(b)(1)(B), as well as LR IA 6-1, LR 26-3, Plaintiff
 22 Hernando Alberto Heredia (“Plaintiff”) and Defendant United States of America (“United
 23 States”), on behalf of the United States Postal Service (“USPS”), by and through their
 24 undersigned counsel, hereby request the Court extend the deadline to file a proposed joint
 25 pretrial order by 60 days from January 24, 2025 to **March 24, 2025**. The current deadline
 26 to file a joint pretrial order is January 24, 2025. ECF No. 32. On January 23, 2025,
 27 Plaintiff’s counsel reached out to the undersigned regarding participating in a settlement
 28 conference before a magistrate judge to try to resolve this case prior to filing a joint pre-trial
 and starting trial preparation. Although the undersigned is not opposed to a settlement
 conference in this case, the undersigned informed counsel that she needs to communicate
 counsel’s request for a settlement conference to the United States Postal Service.
 Considering both counsel workload schedules and the parties attempt to get this case
 resolved prior to trial, the parties respectfully request the Court grant their stipulation to

1 extend the joint pretrial order deadline to **March 24, 2025**. The parties will submit a
2 separate stipulation and order for a settlement conference before a magistrate judge. If this
3 case does not settle, the parties agree to provide a joint pretrial order within 14 days of the
4 conclusion of the settlement conference. This is the second request to extend the deadline
5 to file a proposed joint pretrial order. This request for an extension is made in good faith
6 and not for the purpose of causing undue delay and prejudice.

7 Respectfully submitted this 23rd day of January 2025.

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9 SUE FAHAMI
10 Acting United States Attorney

HICKS & BRASIER, PLL

11
12 /s/ Virginia T. Tomova
13 VIRGINIA T. TOMOVA
14 Assistant United States Attorney

/s/ Betsy C. Jefferis-Aguilar
BETSY C. JEFFERIS-AGUILAR
Attorney for Plaintiff

15 **IT IS SO ORDERED:**

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18 **RICHARD F. BOULWARE, II**
19 **UNITED STATES DISTRICT JUDGE**

20 **DATED:** January 24, 2025
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